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Department of Health & Environment

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INFORMATION NOTICE: KS IN 2017-01
Use of Portable or Mobile X-Ray Units

ADDRESSEES

All Kansas X-ray Registrants that have Medical X-ray Equipment.

PURPOSE

The Kansas Department of Health and Environment (KDHE) is issuing this Information Notice to inform registrants about the use of Portable or Mobile X-Ray Units and the regulations that pertain to this equipment.

DESCRIPTION OF CIRCUMSTANCES

The primary concern about the use of mobile or portable x-ray equipment is the potential for exposure to staff and other members of the public from use of mobile equipment in areas not evaluated for shielding, and the potential for poor image quality. The Department recognizes that infrequent use of a mobile or portable x-ray system in an area not evaluated for shielding is sometimes necessary for patient care. To ensure that the risk of radiation exposure is associated with the benefit of a high quality radiographic image, the use of portable or mobile x-ray machines for human diagnostic procedures is restricted to patients who cannot be transferred to a stationary x-ray machine. Human diagnostic radiographs should be obtained from the use of stationary x-ray units, as much as possible. Facilities that wish to use a portable or mobile x-ray machine as their primary imaging system must first obtain Department approval.

The purpose of this information notice is to identify regulatory requirements and clarify the Department's position on the use of mobile or portable x-ray equipment.

This information notice defines the position of the Department on the use of portable or mobile x-ray machines such as the GE AMX series, the MinXRay Medical units or any similar unit. This information notice does not address x-ray systems used in mobile coaches or hand-held dental units.

DISCUSSION

Regulations:

The Kansas Department of Health and Environment (KDHE), Kansas Administrative Regulations, K.A.R. 28-35-135m (p) http://www.kdheks.gov/radiation/download/KAR_2009.pdf defines "Mobile X-ray equipment" as X-ray equipment mounted on a permanent base with wheels or casters, or both, for moving while completely assembled. This term shall include X-ray equipment mounted in a vehicle.

K.A.R. 28-35-135p (t) http://www.kdheks.gov/radiation/download/KAR_2009.pdf defines "Portable X-ray Equipment" as X-ray equipment designed to be hand-carried.

K.A.R. 28-35-242a (a)(8)(C) http://www.kdheks.gov/radiation/download/KAR_2009.pdf states that portable or mobile X-ray equipment shall be used only for examinations during which transferring the patient or patients to a stationary X-ray installation is impractical.

K.A.R. 28-35-244a (b)(6)(B) (i) http://www.kdheks.gov/radiation/download/KAR_2009.pdf states that if a mobile or portable x-ray system is used for one week or more at the same location, including a room or a suite, it must meet the same requirements of a stationary system.

K.A.R. 28-35-244a (b)(6)(B)(ii) http://www.kdheks.gov/radiation/download/KAR_2009.pdf states that if the mobile or portable x-ray system is use for less than one week at the same location, it must be provided with either a protective barrier that is at least 6.5 feet high for operator protection during exposures or a means to allow the operator to be at least 9 feet from the tube housing assembly during the exposure.

Interpretation of Regulations:

Portable x-ray equipment shall only be used for examinations where it is impractical to transfer the patient(s) to a stationary x-ray installation. “Impractical” as used in Department regulations can be interpreted in a variety of ways. Mobile equipment is designed to be used on patients that are too ill or injured to make the trip to a stationary x-ray system. If a patient can ambulate or be transported to a stationary x-ray system for their x-ray exam, it shall be done in that manner.

If a facility wishes to use portable equipment as their primary x-ray equipment, that facility must obtain Department approval prior to that use. The Department will ensure that the facility is addressing all issues in Department regulations that could come into play with each individual situation. Temporary use of portable equipment may be granted, but the approval is at the discretion of the Department and each specific situation. If the facility is inspected and found to be using portable x-ray equipment as the primary x-ray equipment, the facility may be cited, and will be required to make changes to become in compliance with Kansas Regulations.

FACILITY ACTIONS NEEDED

If your facility is using a stationary x-ray unit as your primary x-ray equipment, no action is needed.

If your facility is using mobile or portable x-ray equipment as stated in regulations, no action is needed.

If your facility is using mobile or portable x-ray equipment as your primary x-ray equipment, contact our Department at the contact information below.

CONTACT

If you have any questions about the information in this notice, please contact Jason Barney at (785) 296-1986 or jason.barney@ks.gov or Jesse Woltje at (785) 296-1993 or jesse.woltje@ks.gov.